

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

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ROBERT E. MCDONALD,

Plaintiffs,



CV 16 02201
Motion Request to Proceed By Filing
Motion Papers Electronically With the
Court

vs.

DONNELLY, J.

AHMED ELKHOLY a.k.a. AHMED
ELKHOLY a.k.a. OMAR ELKHOLY

BLOOM, M.J.

Defendants.
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NOW COMES THE PLAINTIFF, Robert E. McDonald, and request that the court grant his application for permission to proceed in this action by filing his papers through the electronic case filing system of the Eastern District of New York.

BACKGROUND

Plaintiff has filed an action to recover damages for the loss and deprivation of his property by Defendant. To this date, plaintiff has filed papers electronically previously in this court and has currently filed papers electronically his brief in the Second Circuit as well.

REQUEST TO USE ELECTRONIC CASE FILING SYSTEM (ECF)

Plaintiff request that he be permitted to file all motion papers and other required documents in this action through the electronic case filing system in the Eastern District of New York. This request is made in order to facilitate a more timely filing and response process for the plaintiff. In

so doing, Plaintiff can ensure that his motion papers are received by the Court and that the Defendants will have ample and equal opportunity review and respond to plaintiff filings.

Approval of the request is also warranted because plaintiff is proceeding in this action in forma pauperis. Having the ability to file the motion papers electronically will limit costs to plaintiff in an action that may require additional expenses that plaintiff does not have. Any resources plaintiff may have should be expended carefully and wisely in this action. The copying and mailing of motion papers can become expensive and the added cost of sending the documents to the U.S. can quickly spiral out of control should the action go to trial. Electronic filing in this action is effective case management and can positively impact the needless expense of judicial resources.

SUCCESSFUL USE OF ELECTRONIC FILING SYSTEM (ECF)

Plaintiff has the ability to successfully use the electronic case filing system. Plaintiff has a Bachelor of Arts Degree in Political Science with a minor in Economics from Morehouse College and post graduate study at Emory University. Plaintiff's application for admission to the California Southern School of Law is under consideration. Additionally, plaintiff has represented himself in a matter before the Honorable Judge John Koeltl in the Southern District of New York. In that case, Plaintiff represented himself in a 10 day jury trial. He cross-examined government witnesses, introduced evidence, provided objections, presented a defense and made both opening and closing statements.

Courses have been taken in Constitutional law, Race and Law, Professional Communication, Critical Thinking and Professional Communication which has contributed to Plaintiff's understanding of the law and case presentation. Additionally, plaintiff possesses a computer manufactured by Hewlett Packard which has the most up to date software including

Microsoft Windows 10 operating system. There is unlimited access to the internet through the use of both Internet Explorer and Google Chrome. Plaintiff has access to all of the software and material that he would need for successful filing through the ECF system.

As indicated above, Plaintiff is now very familiar with the ECF filing system as he has electronically filed in this court previously and has filed electronically in the Second Circuit Court of Appeals.

CONCLUSION

For the reasons stated above, Plaintiff request that this court grant his application to proceed in this action by filing his motion papers through the electronic case filing system in the Eastern District of New York. Furthermore that the office of the court clerk assist Plaintiff by providing the necessary setup information to establish an ECF account for filing motion papers in this action. If Possible, Plaintiff seeks reactivation of his sign-in name and password which he used in his previous filing.

Respectfully submitted,

Robert E. McDonald

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Dated: April 26, 2016
Ponce, Puerto Rico

917-403-1298